

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK

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NICOLE BROECKER, et al., on behalf of themselves and
all other similarly situated employees of the New
York City Department of Education,,

Plaintiffs,

- against -

NEW YORK CITY DEPARTMENT OF EDUCATION,
MEISHA PORTER, et al.,

Defendants.
----- X

**DECLARATION OF
ANDREA O’CONNOR IN
SUPPORT OF DOE
DEFENDANTS’
MOTION TO DISMISS
THE AMENDED
COMPLAINT**

No. 21 Civ 6387 (KAM)(LB)

ANDREA O’CONNOR declares, pursuant to 28 U.S.C. § 1746 and subject to the
penalties of perjury, that the following is true and correct:

1. I am an Assistant Corporation Counsel in the office of Hon. Sylvia O.
Hinds-Radix, Corporation Counsel of the City of New York, attorney for Defendants New York
City Department of Education and Meisha Porter (collectively DOE Defendants) and as such I am
familiar with the facts as set forth herein.

2. I respectfully submit this declaration in support of DOE Defendants’
Motion to Dismiss the Amended Complaint.

3. Attached hereto as Exhibit “A” is copy of the unpublished decision in
Maniscalco v. BOE, et al., Index No. 160725/2021 (N.Y. Sup., N.Y. Cnty); Giammarino v. BOE,
et al., Index No. 160829/2021 (N.Y. Sup., N.Y. Cnty); Clarke v. BOE, et al., Index No.

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DECLARATION

HON. SYLVIA O. HINDS-RADIX

*Corporation Counsel of the City of New York
Attorney for DOE Defendants
100 Church Street, Room 2-100
New York, N.Y. 10007*

*Of Counsel: Andrea O'Connor
Tel: (212) 356-4015*

Due and timely service is hereby admitted.

New York, N.Y., 20.....

....., Esq.

Attorney for.....